IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

DESHAWNDA L WILLIAMS

DEBTOR :

: BANKRUPTCY NO.: 20-10630-amc

RESPONSE TO MOVANT'S MOTION FOR RELIEF

Debtor ("Respondent"), by their attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

- 1. Admitted.
- 2. Admitted.
- 3. Denied. Movant's averment consists of information filed and on record before the Court. Debtor does not attest to the veracity of said documents, thus Movant's averment is denied.
 - 4. Admitted.
 - 5. Admitted.
 - 6. Denied. Debtor has made said payments.
 - 7. Denied. Debtor has cured the alleged post-petition arrearage.
 - 8. Denied. Movant states a conclusion of law to which no response is required.
 - 9. Denied. Movant states a conclusion of law to which no response is required.

WHEREFORE, Debtor prays that the Movant's Motion be denied.

Date: August 29, 2023 /s/ Brandon J. Perloff

Brandon J. Perloff Esquire bperloff@perlofflaw.com

215-287-4231 Attorney for Debtor